

Applicants submit this Amendment in reply to the Office Action mailed March 25, 2005.

By this Amendment, Applicants have amended claim 1. No new matter has been introduced.

Before entry of this Amendment After Final, claims 2-20 were pending in this application, with claims 6-12 having been withdrawn from consideration. After entry of this Amendment, claims 2-20 are still pending in this application, with claims 6-12 still having been withdrawn from consideration. Claims 2 and 6 are the sole independent claims.

In the Office Action, claims 1-5, 13, 14, and 16-20 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,038,050 to Minoura et al. ("Minoura"). Applicants respectfully traverse this rejection. For anticipation under 35 U.S.C. §102, the reference must teach every aspect of the claimed invention either explicitly or implicitly. M.P.E.P. 706.02. Because Minoura does not teach every aspect of claims 2-5, 13, 14, and 16-20 either alone or in combination with the other aspects of the claimed invention, Minoura does not anticipate any of those claims.

Minoura does not disclose or suggest the invention claimed in as-amended independent claim 2. For example, independent claim 2 recites a relay unit including, among other aspects, "wherein said downstream fuse connector portion and said relay terminal protrude in directions opposed to one another." Minoura does not disclose at least these aspects of the claimed invention either alone or in combination with the other aspects of the claimed invention.

Specifically, Fig. 4 of Minoura only schematically discloses the relationship between busbar 15, junction box 12, and fuselinks 20. Accordingly, even assuming *arguendo* that Minoura discloses a downstream fuse connector portion and a relay terminal, it is not possible to determine the directional orientation of any downstream fuse connector portion and relay terminal relative to each other. The same is true for Fig. 3 in Minoura, as Fig. 3 only discloses the exterior portion of junction box 12, also making it not possible to determine the directional orientation of any downstream fuse connector portion and relay terminal relative to each other. Indeed, even assuming *arguendo* that the schematic representation of junction box 12 in Fig. 4 was accurate as to orientation, any alleged downstream fuse connector portion and relay terminal are disposed perpendicular to each other, a conclusion that is not contradicted by Fig. 3. Accordingly, Minoura does not disclose at least this aspect of independent claim 2.

Furthermore, with regard to the Section 102(b) of claims 16, 17, 18, and 20 over Minoura, Applicants incorporate the remarks set forth on pages 8-9 of the Amendment After Final filed December 6, 2004. Specifically, because it appears that official notice is being taken that the aspects set forth in claims 16, 17, 18, and 20 are of “a notorious character” capable of “instant and unquestionable demonstration as being well-known,” as the Office Action has not addressed how Minoura necessarily discloses the aspects set forth in each of claims 16, 17, 18, and 20 as required for an inherency rejection other than to state that “any one of common skill in the art knows,” under the provisions of M.P.E.P. 2144.03(C), Applicants respectfully request that either documentary evidence of these allegedly well known facts be provided, or that an affidavit or

declaration under 37 C.F.R. §1.104(d)(2) setting forth the specific factual statements and explanation to support the finding be executed.

Accordingly, because Minoura does not disclose every aspect of the invention either alone or in combination with the other aspects of the claimed invention, Applicants respectfully request withdrawal of the Section 102(b) rejection.

On pages 5-6 of the Office Action, claim 15 was rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,038,050 to Minoura et al. ("Minoura"). Applicants respectfully traverse this rejection for the same reasons as set forth on pages 9-11 of the Amendment filed December 6 2004.

Specifically, even though the Office Action admits on page 5 that Minoura does not disclose an electrically conductive trimmer joint as set forth in claim 15, the Office Action does not either provide another reference that includes an electrically conductive trimmer joint, nor does the Office Action set forth a proper motivation that an electrically conductive trimmer joint would be obvious, as the alleged motivation is impermissibly conclusory and not found in the prior art as required by case law. Thus, again, because it appears that official notice is being taken that the aspects set forth in claim 15 is of "a notorious character" capable of "instant and unquestionable demonstration as being well-known," under the provisions of M.P.E.P. 2144.03(C), Applicants respectfully request that either documentary evidence of these allegedly well known facts be provided, or that an affidavit or declaration under 37 C.F.R. §1.104(d)(2) setting forth the specific factual statements and explanation to support the finding be executed.

Accordingly, Applicants again respectfully request withdrawal of the Section 103(a) rejection based on Minoura.

Applicants further submit that claims 3-5 and 13-20 depend from independent claim 2, and are therefore allowable for at least the same reasons that independent claim 2 is allowable. In addition, at least some of the dependent claims recite unique combinations that are neither taught nor suggested by Minoura and therefore at least some also are separately patentable.

The Office Action contains characterizations of the claims and the related art with which Applicants do not necessarily agree. Unless expressly noted otherwise, Applicants decline to subscribe to any statement or characterization in the Office Action.

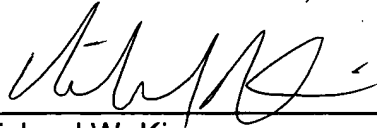
In discussing the specification, claims, abstract, and drawings in this Amendment it is to be understood that Applicants are in no way intending to limit the scope of the claims to any exemplary embodiments described in the specification or abstract and/or shown in the drawings. Rather, Applicants are entitled to have the claims interpreted broadly, to the maximum extent permitted by statute, regulation, and applicable case law.

Please grant any extensions of time required to enter this Amendment and charge any additional required fees to our Deposit Account No. 06-0916.

Respectfully submitted,

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Dated: June 24, 2005

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